

Public Disclosure Policy

Ebdaa Microfinance Company – Bahrain

Effective Date: 02/01/2024

Approved by: Board of Directors

Review Cycle: As per the active laws

1. Purpose and Objectives

The purpose of this Public Disclosure Policy is to ensure that Ebdaa Microfinance Company ("the Company") maintains the highest level of transparency, accountability, and trust with its stakeholders—including clients, investors, regulators, employees, and the public—through timely and accurate dissemination of relevant information. This policy is designed to:

- Comply with the Central Bank of Bahrain (CBB) Rulebook - Volume 5
- Enhance market discipline
- Support informed decision-making by stakeholders
- Uphold the Company's commitment to good governance and ethical conduct

2. Scope and Applicability

This policy applies to:

- All employees and departments involved in financial reporting, communications, and regulatory compliance
- All forms of public disclosures, including financial statements, operational reports, marketing materials, website content, and responses to public inquiries

3. Regulatory and Legal Framework

Ebdaa Microfinance Company adheres to the disclosure requirements outlined in:

- The Central Bank of Bahrain Rulebook – Volume 5
- The Commercial Companies Law of Bahrain
- International Financial Reporting Standards (IFRS)
- Industry best practices for microfinance institutions (e.g., CGAP, MIX Market, Smart Campaign)

4. Disclosure Principles

The Company shall adhere to the following principles:

- Transparency
- Accuracy

- Consistency
- Materiality
- Proactivity

5. Types of Information Disclosed

Type of Information	Frequency	Disclosure Channel
Annual Audited Financial Statements	Annually	Company website, Annual Report, CBB
Board of Directors Report	Annually	Company website
Ownership Structure	Annually / Upon Change	Website, CBB
Corporate Governance Report	Annually	Website, CBB
Key Financial Ratios and Portfolio Quality	Quarterly	Website, CBB
Interest Rates and Fees	Ongoing	Branches, Website, Client materials
Social Impact Metrics	Annually	Website, Annual Report
Client Protection Principles Compliance	Annually	Website, Audits
Any Material Changes	As Occurs	Website, CBB

6. Disclosure Mechanisms

Disclosures will be made using the following approved channels:

- Company Website (www.ebdaabahrain.com)
- Annual Reports and Client Reports
- Official Social Media Accounts
- CBB Portal (for regulatory submissions)
- Public Forums or Conferences (when appropriate)

All documents must be published in Arabic and English.

7. Internal Controls and Responsibilities

- Board of Directors: Overall oversight and approval of all public disclosures
- CEO: Ensures implementation of disclosure practices and compliance with policy
- Compliance Officer: Reviews disclosures for regulatory alignment

- Finance Department: Prepares and validates financial data and reports
- Communications/PR: Manages website and public materials

8. Confidentiality and Limitations

Information that is:

- Commercially sensitive
- Client-specific
- Legally restricted

...shall not be publicly disclosed unless required by law or regulatory authority, and only after appropriate safeguards are in place.

9. Review and Updates

This policy shall be reviewed annually, or upon:

- A material change in regulatory requirements
- A change in company structure or ownership
- A significant breach or failure in disclosure

Amendments shall be proposed by the Compliance Officer and approved by the Board of Directors.

10. Breach of Policy

Non-compliance with this policy may result in:

- Disciplinary action
- Regulatory sanctions
- Reputational damage

All breaches must be reported immediately to the Compliance Department.

11. Contact and Access

Any questions regarding this policy or requests for additional information should be directed to:

Compliance Officer
Ebdaa Microfinance Company – Bahrain
Email: Ali Al-Qaseer
Phone: +973.17.381.000